

EXHIBIT A

Leena Varughese v. Mount Sinai Medical Center, et al. 12 Civ. 8812 (CM) (JCF)
Defendants' Privilege Log
November 22, 2013

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
1	ESLPriv. 00001	4/28/2011	Arthur Figur	Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex, Patrick Lento	Scott Barnett, Paul Johnson	Email	Email to legal counsel for legal Academic Advisement		Attorney-Client Privilege
2	ESLPriv. 00002- ESLPriv. 00003	4/28/2011	Arthur Figur	Scott Barnett, Patrick Lento, Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex, Paul Johnson		Email	Email to legal counsel for legal Mount Sinai disciplinary procedure		Attorney-Client Privilege
3	ESLPriv. 00004- ESLPriv. 00005	4/28/2011	Arthur Figur	Scott Barnett, Patrick Lento, Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex, Paul Johnson		Email	Email to legal counsel for legal Mount Sinai disciplinary procedure		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
4	ESLPriv. 00006	4/28/2011	Arthur Figur	Marina Lowy (Senior Associate General Counsel), Patrick Lento, Caryn Tiger-Paillex	Scott Barnett, Paul Johnson	Email	Email to legal counsel seeking legal advice regarding a resident issue		Attorney-Client Privilege
5	ESLPriv. 00007- ESLPriv. 00008	5/9/2011	Basil Odintsov	Scott Barnett, Andrew Castaldi, Marina Lowy (Senior Associate General Counsel), Paul Johnson, Arthur Figur	Patrick Lento, Carlos Cordon-Cardo	Email	Email to legal counsel seeking legal advice regarding a resident issue		Attorney-Client Privilege
6	ESLPriv. 00009- ESLPriv. 00010	5/9/2011	Basil Odintsov	Scott Barnett, Andrew Castaldi, Marina Lowy (Senior Associate General Counsel), Paul Johnson, Arthur Figur	Patrick Lento, Carlos Cordon-Cardo	Email	Email to legal counsel seeking legal advice regarding a resident issue		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (if Produced in Part)	Basis for withholding
7	ESLPriv. 00011- ESLPriv. 00012	5/9/2011	Andrew Castaldi	Basil Odintsov, Scott Barnett, Marina Lowy (Senior Associate General Counsel), Paul Johnson, Arthur Figur	Patrick Lento, Carlos Cordon-Cardo	Email	Email to legal counsel seeking legal advice regarding a resident issue		Attorney-Client Privilege
8	ESLPriv. 00013- ESLPriv. 00014	5/25/2011	Carlos Cordon-Cardo	Scott Barnett, Patrick Lento, Paul Johnson, Marina Lowy (Senior Associate General Counsel)	Andrew Castaldi, Arthur Figur, Patrick Lento	Email	Email to legal counsel seeking legal advice regarding Academic Advisement		Attorney-Client Privilege
9	ESLPriv. 00015- ESLPriv. 00018	5/25/2011	Marina Lowy (Senior Associate General Counsel)	Scott Barnett, Carlos Cordon-Cardo	Patrick Lento, Paul Johnson, Andrew Castaldi, Arthur Figur, Phillip Williams, Caryn Tiger-	Email	Email from legal counsel providing legal advice regarding Academic Advisement		Attorney-Client Privilege

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					Paillex				
10	ESLPriv. 00019- ESLPriv. 00022	5/25/2011	Andrew Castaldi	Marina Lowy (Senior Associate General Counsel), Scott Barnett, Carlos Cordon-Cardo, Basil Odintsov	Patrick Lento, Paul Johnson, Arthur Figur, Phillip Williams, Caryn Tiger-Paillex	Email	Email to legal counsel seeking legal advice regarding Academic Advisement		Attorney-Client Privilege
11	ESLPriv. 00023- ESLPriv. 00027	5/27/2011	Basil Odintsov	Andrew Castaldi, Marina Lowy (Senior Associate General Counsel), Scott Barnett, Carlos Cordon-Cardo	Patrick Lento, Paul Johnson, Arthur Figur, Phillip Williams, Caryn Tiger-Paillex	Email	Email to legal counsel seeking legal advice regarding Academic Advisement		Attorney-Client Privilege
12	ESLPriv. 00028- ESLPriv. 00032	5/27/2011	Marina Lowy (Senior Associate General Counsel)	Basil Odintsov, Andrew Castaldi, Scott Barnett, Carlos Cordon-Cardo	Patrick Lento, Paul Johnson, Arthur Figur, Phillip Williams, Caryn Tiger-Paillex	Email	Email from legal counsel regarding legal advice on Academic Advisement		Attorney-Client Privilege
13	ESLPriv.	6/23/2011	Patrick Lento	Scott Barnett,	Scott Barnett,	Email	Email seeking	D ESI	Attorney-Client

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (if Produced in Part)	Basis for withholding
	00033- ESLPriv. 00034			Allene Carter	Paul Johnson, Caryn Tiger- Paillex, Marina Lowy (Senior Associate General Counsel)		legal advice on Mount Sinai policy	025934 - D_ESI 025937	Privilege
14	ESLPriv. 00035	6/23/2011	Patrick Lento	Scott Barnett, Allene Carter	Scott Barnett, Paul Johnson, Caryn Tiger- Paillex, Marina Lowy (Senior Associate General Counsel)	Email	Email seeking legal advice on Mount Sinai policy	D_ESI 025938- D_ESI 025940	Attorney-Client Privilege
15	ESLPriv. 00036- ESLPriv. 00037	7/1/2011	Paul Johnson	Scott Barnett	Caryn Tiger- Paillex, Marina Lowy (Senior Associate General Counsel), Scott Barnett	Email	Email seeking legal advice regarding draft of warning letter for Plaintiff		Attorney-Client Privilege
16	ESLPriv. 00038	7/5/2011	Paul Johnson	Carlos Cordon- Cardo, Patrick Lento, Adolfo Firpo	Marina Lowy (Senior Associate General Counsel), Caryn Tiger- Paillex, Scott	Email	Email seeking legal advice regarding draft of warning letter for Plaintiff		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
					Barnett				
17	ESLPriv. 00039- ESLPriv. 00041	7/1/2011	Caryn Tiger-Paillex (for Patrick Lento)	Leena Varughese		Letter (draft)	Draft of final warning letter attached to email submitted for review by and advice from legal counsel		Work Product
18	ESLPriv. 00042	7/6/2011	Patrick Lento	Carlos Cordon-Cardo, Patrick Lento, Paul Johnson, Adolfo Firpo	Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex, Scott Barnett	Email	Email seeking legal advice regarding a draft of the warning letter for Plaintiff		Attorney-Client Privilege
19	ESLPriv. 00043	7/6/2011	Patrick Lento	Paul Johnson, Carlos Cordon-Cardo, Adolfo Firpo	Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex, Scott Barnett	Email	Email seeking legal advice regarding a draft of the warning letter for Plaintiff		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
20	ESLPriv. 00044- ESLPriv. 00046	7/1/2011	Caryn Tiger-Paillex (for Patrick Lento)	Leena Varughese		Letter (draft)	Draft of final warning letter submitted for review by and advice from legal counsel		Work Product
21	ESLPriv. 00047	7/6/2011	Paul Johnson	Patrick Lento	Carlos Cordon-Cardo, Adolfo Firpo, Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex, Scott Barnett	Email	Email seeking legal advice regarding a draft of the warning letter for Plaintiff		Attorney-Client Privilege
22	ESLPriv. 00048- ESLPriv. 00050	7/1/2011	Caryn Tiger-Paillex (for Patrick Lento)	Leena Varughese		Letter (draft)	Draft of final warning letter submitted for review by and advice from legal counsel		Work Product
23	ESLPriv. 00051- ESLPriv. 00052	7/28/2011	Patrick Lento	Adrienne Jordan, Marina Lowy (Senior Associate General Counsel), Scott Barnett, Paul Johnson,		Email	Email to legal counsel seeking legal advice regarding residency program		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
				Elizabeth Morency, Adolfo Firpo					
24	ESLPriv. 00053- ESLPriv. 00054	7/8/2011	Scott Barnett	Patrick Lento, Adrienne Jordan, Marina Lowy (Senior Associate General Counsel), Paul Johnson, Elizabeth Morency, Adolfo Firpo		Email	Email to legal counsel seeking legal advice regarding residency program		Attorney-Client Privilege
25	ESLPriv. 00055- ESLPriv. 00056	7/14/2011	Marina Lowy (Senior Associate General Counsel)	Carlos Cordon-Cardo	Adolfo Firpo, Scott Barnett, Patrick Lento, Paul Johnson, Caryn Tiger-Paillex	Email	Email from legal counsel providing legal advice regarding response to Plaintiff's retention of attorney		Attorney-Client Privilege
26	ESLPriv. 00057- ESLPriv. 00059	7/14/2011	Paul Johnson	Marina Lowy (Senior Associate General		Email	Email to legal counsel seeking legal advice regarding final		Attorney-Client Privilege

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27	ESLPriv. 00060- ESLPriv. 00062	7/15/2011	Marina Lowy (Senior Associate General Counsel)	Counsel) Scott Barnett, Paul Johnson, Caryn Tiger- Paillex	Scott Barnett, Adolfo Firpo	Email	warning Email from legal counsel providing legal advice regarding the appeal process		Attorney-Client Privilege
28	ESLPriv. 00063- ESLPriv. 00064	8/1/2011	Paul Johnson	Adolfo Firpo	Marina Lowy (Senior Associate General Counsel), Caryn Tiger- Paillex, Scott Barnett, Adolfo Firpo, Carlos Cordon- Cardo, Patrick Lento, Shema Patel	Email	Email seeking legal advice regarding final warning appeal process		Attorney-Client Privilege
29	ESLPriv. 00065- ESLPriv. 00069	8/11/2011	Scott Barnett	Adolfo Firpo, Scott Barnett, Paul Johnson	Patrick Lento, Vesna Najfeld, Carlos Cordon- Cardo, Adrienne Jordan, Shema Patel, Marina Lowy (Senior Associate General	Email	Email seeking legal advice regarding disciplinary action		Attorney-Client Privilege

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					Counsel), Caryn Tiger-Paillex				
30	ESLPriv. 00070- ESLPriv. 00074	8/11/2011	Adrienne Jordan	Adolfo Firpo, Scott Barnett, Paul Johnson, Elizabeth Morency	Patrick Lento, Vesna Najfeld, Carlos Cordon-Cardo, Shema Patel, Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex	Email	Email seeking legal advice regarding disciplinary action		Attorney-Client Privilege
31	ESLPriv. 00075- ESLPriv. 00082	8/15/2011	Scott Barnett	Marina Lowy (Senior Associate General Counsel)	Scott Barnett, Adolfo Firpo, Paul Johnson, Shema Patel, Caryn Tiger-Paillex, Patrick Lento	Email	Email to legal counsel discussing legal advice regarding meeting procedure		Attorney-Client Privilege
32	ESLPriv. 00083- ESLPriv. 00090	8/15/2011	Adolfo Firpo	Scott Barnett, Marina Lowy (Senior Associate General Counsel)	Paul Johnson, Shema Patel, Caryn Tiger-Paillex, Patrick Lento	Email	Email to legal counsel discussing legal advice regarding a meeting with Plaintiff	D_ESI 025943- D_ESI 025950	Attorney-Client Privilege
33	ESLPriv. 00091-	8/15/2011	Scott Barnett	Adolfo Firpo	Marina Lowy (Senior)	Email	Email discussing legal advice		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
	ESLPriv. 00100				Associate General Counsel), Paul Johnson, Shema Patel, Caryn Tiger-Paillex, Patrick Lento		regarding a meeting with Plaintiff		
34	ESLPriv. 00101	8/21/2011	Paul Johnson	Marina Lowy (Senior Associate General Counsel), Scott Barnett, Caryn Tiger-Paillex		Email	Email to legal counsel seeking legal advice regarding confidentiality		Attorney-Client Privilege
35	ESLPriv. 00102- ESLPriv. 00106	9/7/2011	Paul Johnson	Adolfo Firpo	Scott Barnett, Carlos Cordon-Cardo, Shema Patel, Marina Lowy (Senior Associate	Email	Email seeking legal advice regarding Mount Sinai policies		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
					General Counsel), Caryn Tiger-Paillex				
36	ESLPriv. 00107-ESLPriv. 00111	9/7/2011	Paul Johnson	Adolfo Firpo	Scott Barnett, Carlos Cordon-Cardo, Shema Patel, Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex	Email	Email seeking legal advice regarding Mount Sinai policies		Attorney-Client Privilege
37	ESLPriv. 00112-ESLPriv. 00118	9/14/2011	Adolfo Firpo	Scott Barnett, Paul Johnson, Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex	Patrick Lento, Carlos Cordon-Cardo	Email	Email to legal counsel seeking legal advice regarding resident concerns	D_ESI 025951- D_ESI 025957	Attorney-Client Privilege
38	ESLPriv. 00119-ESLPriv. 00125	9/14/2011	Adolfo Firpo	Scott Barnett, Paul Johnson, Marina Lowy (Senior	Patrick Lento, Carlos Cordon-Cardo	Email	Email to legal counsel seeking legal advice regarding	D_ESI 025958- D_ESI 025964	Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
				Associate General Counsel), Caryn Tiger-Paillex			resident concerns		
39	ESLPriv. 00126- ESLPriv. 00131	9/14/2011	Caryn Tiger-Paillex	Adolfo Firpo, Scott Barnett, Paul Johnson, Marina Lowy (Senior Associate General Counsel)	Patrick Lento, Carlos Cordon-Cardo	Email	Email to legal counsel seeking legal advice regarding resident concerns		Attorney-Client Privilege
40	ESLPriv. 00132- ESLPriv. 00138	9/14/2011	Patrick Lento	Adolfo Firpo, Caryn Tiger-Paillex, Scott Barnett, Paul Johnson, Marina Lowy (Senior Associate General Counsel), Bruce Petersen	Carlos Cordon-Cardo, Shema Patel	Email	Email to legal counsel seeking legal advice regarding resident concerns and conference credit		Attorney-Client Privilege
41	ESLPriv. 00139-	9/14/2011	Adrienne Jordan	Adolfo Firpo	Scott Barnett, Paul Johnson,	Email	Email seeking legal advice		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (if Produced in Part)	Basis for withholding
	ESLPriv. 00147				Shema Patel, Carlos Cordon-Cardo, Patrick Lento, Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex		about resident concerns		
42	ESLPriv. 00148- ESLPriv. 00151	9/15/2011	Caryn Tiger-Paillex	Marina Lowy (Senior Associate General Counsel), Paul Johnson, Scott Barnett	Adolfo Firpo, Shema Patel, Scott Barnett, Patrick Lento, Carlos Cordon-Cardo, Bruce Petersen	Email	Email to legal counsel seeking legal advice regarding FMLA procedure		Attorney-Client Privilege
43	ESLPriv. 00152- ESLPriv. 00157	9/19/2011	Adolfo Firpo	Marina Lowy (Senior Associate General Counsel), Scott Barnett, Paul Johnson, Caryn Tiger-Paillex	Shema Patel, Patrick Lento, Bruce Petersen	Email	Email to legal counsel requesting legal advice regarding FMLA procedure		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (if Produced in Part)	Basis for withholding
44	ESLPriv. 00158- ESLPriv. 00163	9/19/2011	Patrick Lento	Adolfo Firpo, Scott Barnett, Paul Johnson, Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex	Sherna Patel, Bruce Petersen	Email	Email to legal counsel seeking legal advice regarding FMLA procedure		Attorney-Client Privilege
45	ESLPriv. 00164- ESLPriv. 00169	9/19/2011	Marina Lowy (Senior Associate General Counsel)	Adolfo Firpo, Scott Barnett, Paul Johnson, Caryn Tiger- Paillex	Sherna Patel, Patrick Lento, Bruce Petersen	Email	Email from legal counsel providing legal advice regarding FMLA procedure		Attorney-Client Privilege
46	ESLPriv. 00170- ESLPriv. 00175	9/19/2011	Marina Lowy (Senior Associate General Counsel)	Adolfo Firpo, Scott Barnett, Paul Johnson, Caryn Tiger- Paillex	Sherna Patel, Patrick Lento, Bruce Petersen	Email	Email from legal counsel providing legal advice regarding Plaintiff's FMLA request		Attorney-Client Privilege
47	ESLPriv. 00176- ESLPriv. 00178	9/19/2011	Paul Johnson	Caryn Tiger- Paillex	Marina Lowy (Senior Associate General Counsel), Scott Barnett, Daniel Hughes, Sherna Patel	Email	Email seeking legal advice regarding FMLA procedure	D_ESI 025965- D_ESI 025967	Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
48	ESLPriv. 00179- ESLPriv. 00185	9/19/2011	Caryn Tiger-Paillex	Marina Lowy (Senior Associate General Counsel), Adolfo Firpo, Scott Barnett, Paul Johnson	Shema Patel, Patrick Lento, Bruce Petersen	Email	Email to legal counsel seeking legal advice regarding FMLA procedure		Attorney-Client Privilege
49	ESLPriv. 00186- ESLPriv. 00192	9/20/2011	Scott Barnett	Adolfo Firpo	Marina Lowy (Senior Associate General Counsel), Paul Johnson, Patrick Lento, Shema Patel, Caryn Tiger-Paillex	Email	Email seeking legal advice regarding FMLA procedure		Attorney-Client Privilege
50	ESLPriv. 00193- ESLPriv. 00197	9/20/2011	Adolfo Firpo	Paul Johnson	Marina Lowy (Senior Associate General Counsel), Patrick Lento, Shema Patel, Scott Barnett, Caryn Tiger-Paillex	Email	Email seeking legal advice regarding FMLA request		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
51	ESLPriv. 00198- ESLPriv. 00205	9/20/2011	Adolfo Firpo	Scott Barnett	Marina Lowy (Senior Associate General Counsel), Paul Johnson, Patrick Lento, Shema Patel, Caryn Tiger- Paillex	Email	Email seeking legal advice regarding FMLA requests		Attorney-Client Privilege
52	ESLPriv. 00206- ESLPriv. 00210	9/20/2011	Shema Patel	Paul Johnson, Adolfo Firpo	Marina Lowy (Senior Associate General Counsel), Patrick Lento, Scott Barnett, Caryn Tiger- Paillex	Email	Email seeking legal advice regarding resident action		Attorney-Client Privilege
53	ESLPriv. 00211- ESLPriv. 00215	9/20/2011	Adolfo Firpo	Patrick Lento, Shema Patel, Paul Johnson	Marina Lowy (Senior Associate General Counsel), Scott Barnett, Caryn Tiger-Paillex	Email	Email seeking legal advice regarding termination		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
54	ESLPriv. 00216- Priv. 00221	9/20/2011	Paul Johnson	Adolfo Firpo	Patrick Lento, Shema Patel, Marina Lowy (Senior Associate General Counsel), Scott Barnett, Caryn Tiger-Paillex	Email	Email seeking legal advice regarding termination		Attorney-Client Privilege
55	ESLPriv. 00222	9/20/2011	Paul Johnson	Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex, Scott Barnett, Carlos Cordon- Cardo, Adolfo Firpo, Patrick Lento, Shema		Email	Email to legal counsel seeking legal advice regarding a draft of the summary suspension and termination letter		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
				Patel, Daniel Hughes					
56	ESLPriv. 00223-ESLPriv. 00228	9/21/2011	Paul Johnson (for Carlos Cordon-Cardo)	Leena Varughese		Letter (Draft)	Draft of summary suspension and termination letter sent to legal counsel for legal advice		Work Product
57	ESLPriv. 00229	9/20/2011	Paul Johnson	Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex, Scott Barnett, Daniel Hughes, Amelie Trahant (Associate General Counsel)		Email	Email to legal counsel seeking legal advice regarding witnesses for upcoming meeting		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
58	ESLPriv. 00230	9/20/2011	Scott Barnett	Paul Johnson, Marina Lowy (Senior Associate General Counsel), Amelie Trahant (Associate General Counsel), Caryn Tiger-Paillex, Carlos Cordon- Cardo, Adolfo Firpo, Patrick Lento, Shema Patel, Daniel Hughes		Email	Email to legal counsel seeking legal advice regarding a draft of summary suspension and termination letter		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
59	ESLPriv. 00231	9/20/2011	Patrick Lento	Paul Johnson, Marina Lowy (Senior Associate General Counsel), Amelie Trabant (Associate General Counsel), Caryn Tiger-Paillex, Scott Barnett, Carlos Cordon-Cardo, Adolfo Firpo, Sherna Patel, Daniel Hughes		Email	Email to legal counsel seeking legal advice regarding a draft of summary suspension and termination letter		Attorney-Client Privilege
60	ESLPriv.	9/21/2011	Paul Johnson	Leena		Letter	Draft of		Work Product

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (if Produced in Part)	Basis for withholding
	00232- ESLPriv. 00237		(For Carlos Cordon-Cardo)	Varughese		(draft)	summary suspension and termination letter sent to legal counsel for legal advice attached to previous email		
61	ESLPriv. 00238- ESLPriv. 00239	9/20/2011	Marina Lowy (Senior Associate General Counsel)	Patrick Lento, Paul Johnson, Amelie Trahan (Associate General Counsel), Scott Barnett, Carlos Cordon-Cardo, Adolfo Firpo, Shema Patel		Email	Email from legal counsel providing legal advice and suggestions regarding a draft of the summary suspension and termination letter		Attorney-Client Privilege
62	ESLPriv. 00240- ESLPriv. 00245	9/21/2011	Paul Johnson (for Carlos Cordon-Cardo)	Leena Varughese		Letter (draft)	Draft of summary suspension and termination letter sent by legal counsel attached		Work Product

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (If Produced in Part)	Basis for withholding
63	ESLPriv. 00246- ESLPriv. 00247	9/21/2011	Adolfo Firpo	Marina Lowy (Senior Associate General Counsel), Patrick Lento, Paul Johnson, Amelie Trahant (Associate General Counsel), Scott Barnett, Carlos Cordon-Cardo, Shema Patel		Email	to previous email Email to legal counsel seeking legal advice regarding termination letter		Attorney-Client Privilege
64	ESLPriv. 00248	9/21/2011	Caryn Tiger-Paillex	Paul Johnson, Marina Lowy (Senior Associate General Counsel), Amelie Trahant (Associate General Counsel), Scott Barnett, Carlos Cordon-Cardo, Adolfo Firpo, Patrick Lento,		Email	Email to legal counsel seeking legal advice regarding a draft of the summary suspension and termination letter		Attorney-Client Privilege

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number Produced (If in Part)	Basis for withholding
65	ESLPriv. 00249- ESLPriv. 00254	9/21/2011	Paul Johnson (for Carlos Cordon- Cardo)	Shema Patel, Daniel Hughes Leena Varughese		Letter (draft)	Draft of summary suspension and termination letter sent to legal counsel for legal advice attached to previous email		Work Product
66	ESLPriv. 00255	9/21/2011	Shema Patel	Paul Johnson, Scott Barnett, Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex, Carlos Cordon- Cardo, Adolfo Firpo		Email	Email to legal counsel requesting legal advice on an additional termination document		Attorney-Client Privilege
67	ESLPriv.	8/17/2011	Scott Barnett	Adolfo Firpo,	Patrick Lento,	Email	Email seeking		Attorney-Client

No.	Bates No.	Date	Author	Address(s)	Copied	Document	Subject	Bates Number (if Produced in Part)	Basis for withholding
	00256- ESLPriv. 00258			Paul Johnson	Carlos Cordon-Cardo, Scott Barnett, Shema Patel, Marina Lowy (Senior Associate General Counsel), Caryn Tiger-Paillex		legal advice regarding Academic Advisement		Privilege
68	ESLPriv. 00259	9/14/2011	Adolfo Firpo	Patrick Lento		Email	Email discussing legal advice from legal counsel regarding resident concerns		Attorney-Client Privilege
69	ESLPriv. 00260- ESLPriv. 00262		Adolfo Firpo			Document	Draft of proposed conference credit suggestions attached to email discussing legal advice from legal counsel regarding resident concerns		Work Product

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70	ESLPriv. 00263	7/12/2011	Patrick Lento	Carlos Cordon-Cardo, Adolfo Firpo		Email	Email discussing legal advice regarding final warning	D ESI 025942	Attorney-Client Privilege